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September 4, 2019

Hon. Barbara Moses  
U.S. District Court  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, NY 10007

RE: Response to Defendants' Request to Adjourn the Initial Pre-Trial Conference in Estate of Meimaris et. al. v. Joseph E. Royce et. al. 1:18-cv-4363

Dear Judge Moses:

I am counsel for Plaintiffs and I am writing to respectfully request the Court either deny Defendants' request to adjourn the pre-trial conference scheduled for September 4, 2019 or in the alternative, grant Plaintiffs leave for oral argument.

This Conference has been scheduled and adjourned on at least five occasions. The pre-trial conference has been scheduled for August 1, 2018, October 2, 2018, January 9, 2019, March 30, 2019 and then again for May 22, 2019 [ECF No's. 20, 57, 78, 107 & 112] Each time, Defendants have requested adjournment. Each time, Defendants' requests were granted.

Plaintiffs are in the process of preparing their objections to the Magistrate's Report and Recommendation and believe that a pre-trial conference should be conducted as it has already been adjourned five times. Defendants have had more than ample adjournments in this case, to do so again, would be unfair to the Plaintiffs. However, Plaintiffs are amenable to an adjournment if an oral argument is scheduled.

For the foregoing reasons, Plaintiffs respectfully request the Court to either deny Defendants' request to adjourn the meeting with Judge Daniels on September 4, 2019 or if in fact the pre-trial conference is adjourned, grant Plaintiffs leave for oral argument.

Respectfully Submitted,

/s/ Alkistis Meimaris  
Alkistis G. Meimaris, Esq.

CC: Counsel of Record via ECF